

**Before the
Federal Communications Commission
Washington DC**

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| In the Matter of |) | |
| |) | |
| Nuclear Energy Institute and |) | |
| United Telecom Council Request for |) | ET Docket No. 05-345 |
| Waiver of Section 74.832(h) of the |) | |
| Commission's Rules |) | |

**COMMENTS OF EXELON GENERATION COMPANY, LLC,
IN SUPPORT OF REQUEST FOR WAIVER**

Exelon Generation Company, LLC, (“ExGen”) submits these comments in support of the request of the Nuclear Energy Institute (“NEI”) and the United Telecom Council (“UTC”) for waiver of section 74.832(h) of the Commission’s rules to permit the use of certain Telex wireless intercom and headset equipment on site at nuclear generating facilities.

ExGen is a wholly owned subsidiary of Exelon Corporation. ExGen manages a diverse portfolio of natural gas, coal, hydro, nuclear, solar and wind generated electricity, comprising more than 38,000 megawatts. It also operates the largest “fleet” of nuclear electric generating facilities in this country – the third largest fleet in the world. Exelon’s ten stations – with 17 reactors – represent approximately 20 percent of the U.S. nuclear industry’s power capacity.

ExGen has been using the Telex equipment in question for a number of years to facilitate critical communications at its nuclear generation facilities

primarily, but not exclusively, during nuclear reactor refueling outages. During refueling outages, plant populations swell several times with personnel necessary not only to complete the complex process of replacing “spent” irradiated nuclear fuel with “fresh” fuel, but also to perform the literally thousands of other maintenance and repair tasks that must be accomplished while the reactor/generator is in shutdown mode.

The safety enhancing benefits of this equipment are manifold. By permitting clear communications with personnel in high radiation areas, it limits the number of personnel that must be located in those areas and facilitates remote continuous monitoring of radiation exposure levels of those personnel. In this regard, it is used specifically in connection with refueling activities such as reactor disassembly, in-vessel inspections – including underwater diving activities, fuel movement and reactor re-assembly. It is also used for under-vessel activities such as control rod drive replacement and nuclear instrumentation maintenance and for communications with the turbine crane operator while moving equipment for turbine related maintenance and repair.

Moreover, the wireless and hands-free characteristics of the Telex equipment enhance safety by permitting maximum worker mobility during communications. In addition, the clarity with which communications can take place with this equipment helps eliminate any potential confusion during these busy times and thus contributes to a safer work environment.

In this regard, the Telex equipment provides high quality audio in a full duplex mode which permits uninterrupted voice communications. In addition, its background noise rejection characteristics are critical for ExGen's use in the very high noise environment of a nuclear plant during a refueling outage – conditions that render other communications systems unusable.

Further, at ExGen's facilities, the Telex equipment is integrated into the remote monitoring consoles which are used to provide remote communications, video monitoring, individual teledosimetry, as well as area radiation monitors and airborne contamination monitors. The equipment is part of the audio sub console which integrates, different radios, intercom equipment, desk phones, and PCS phones and allows work groups and conferences to be patched together to support immediate problem solving needs quickly and efficiently.

ExGen would also note that it has utilized this equipment for a number of years without any apparent interference to authorized users, and that, as indicated in the Petition, the equipment's extremely low power output and the environments in which it is used render it extremely unlikely and any future interference will occur. Tests have shown that the signal attenuates to zero at about 2000 feet in the open and at virtually zero feet when any structure intervenes.

For all these reasons, ExGen respectfully requests that the
Commission grant the waiver requested by NEI and UTC.

Respectfully submitted,
Exelon Generation Company, LLC

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Dated: January 17, 2006